

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

KURT J. COFANO,

Debtor.

KURT J. COFANO,

Movant,

vs.

Bankruptcy No. 20-20810-CMB

Chapter 11

Document No.

Related to Doc. No. 1

NO RESPONDENT.

**MOTION FOR ENLARGEMENT OF TIME TO
FILE SUBMISSIONS TO COMPLETE DEFICIENT FILING**

AND NOW, comes Kurt J. Cofano, the Debtor in the above Chapter 11 Case, by and through his Counsel, Robert O Lampl, John P. Lacher, David L. Fuchs, Ryan J. Cooney and Sy O. Lampl, and files this **MOTION FOR ENLARGEMENT OF TIME TO FILE SUBMISSIONS TO COMPLETE DEFICIENT FILING** as follows:

1. The Movant is Kurt J. Cofano, the Debtor in the above Chapter 11 Case.
2. The Movant commenced the above Chapter 11 Case by filing a Petition for Relief with the Clerk of this Honorable Court on March 2, 2020.
3. At the time of the filing of the Petition for Relief, the Movant did not have available and did not provide various items of information and documents which needed to be provided by the Movant to complete his Petition. The deadline by which the Movant is to submit the items necessary for the completion of the Petition is March 16, 2020.
4. The Movant requires, and respectfully requests, an enlargement of the time in which he is to cure the deficiencies in his Petition.

5. Specifically, the Movant requests an enlargement of time in the amount of fourteen (14) days, until March 30, 2020, to submit the materials necessary to complete his Petition.

6. The basis for the requested enlargement is that the Debtor needs more time to fully gather materials necessary for completion of the Petition.

7. The Debtor has been diligent in gathering the materials necessary to complete his Petition but needs more time to do so.

8. No prior enlargements of time have been requested in the matter.

9. No party will be prejudiced if the enlargement of time being requested herein is granted.

Wherefore, it is respectfully requested that this Honorable Court enter an Order enlarging the time in which the Debtor may cure the deficiencies in his Petition by a period of fourteen (14) days, until March 30, 2020.

Respectfully Submitted,

Date: March 16, 2020

/s/ Robert O Lampl
ROBERT O LAMPL
PA I.D. 19809
JOHN P. LACHER
PA I.D. #62297
DAVID L. FUCHS
PA I.D. #205694
RYAN J. COONEY
PA I.D. #319213
SY O. LAMPL
PA I.D. # 324741
Counsel for the Debtor
223 Fourth Avenue, 4th Floor
Pittsburgh, PA 15222
(412) 392-0330 (phone)
(412) 392-0335 (facsimile)
Email: rlampl@lampllaw.com

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CERTIFICATE OF SERVICE

Robert O Lampl, John P. Lacher, David L. Fuchs, Ryan J. Cooney and Sy O. Lampl hereby certify, that on the 16th day of March, 2020, a true and correct copy of the foregoing **MOTION FOR ENLARGEMENT OF TIME TO FILE SUBMISSIONS TO COMPLETE DEFICIENT FILING** was served upon the following (*via electronic service*):

Office of U.S. Trustee
Liberty Center, Suite 970
1001 Liberty Avenue
Pittsburgh, PA 15222

/s/ Robert O Lampl

ROBERT O LAMPL

PA I.D. 19809

JOHN P. LACHER

PA I.D. #62297

DAVID L. FUCHS

PA I.D. #205694

RYAN J. COONEY

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SY O. LAMPL

PA I.D. # 324741

Counsel for the Debtor

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Pittsburgh, PA 15222

(412) 392-0330 (phone)

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Email: rlampl@lampllaw.com